

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Vilian Maritza Callaghan

(Enter above the full name of
plaintiff in this action)

v.

Fred A. Good and

Julie E Good

(Enter above the full name of
the defendant(s) in this action)

CIVIL CASE NO: _____

(to be supplied by Clerk
of the District Court)

FILED
HARRISBURG, PA

JAN 24 2024

PER _____

DEPUTY CLERK

COMPLAINT

1. The plaintiff Vilian Callaghan a citizen of
the County of York County State of

Pennsylvania, residing at 6071 Pine Rd, Thomasville PA 17364

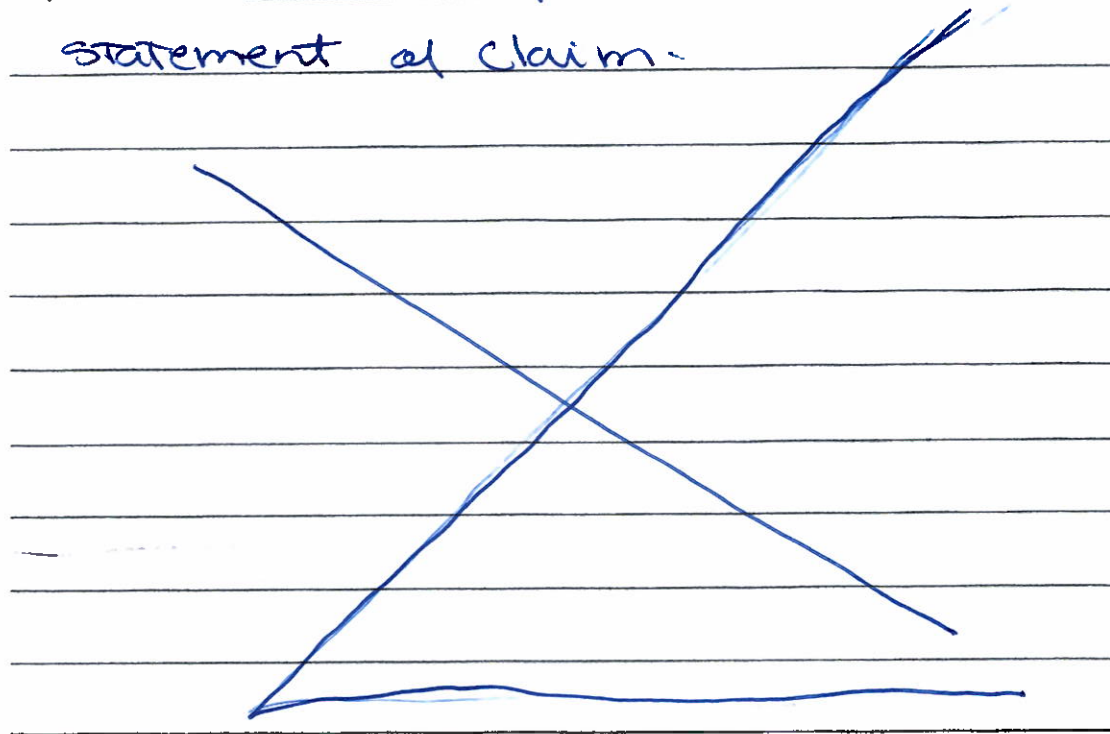
wishes to file a complaint under Complaint For Sory for Wrongful ejection as a
Tenant (give Title No. etc.)

2. The defendant is Fred Good and Julie Good

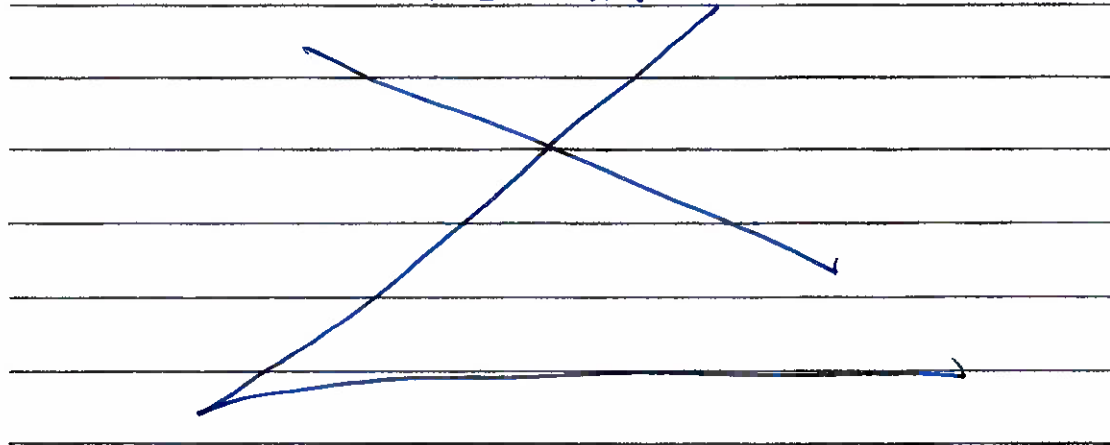
4092 Manchester St, Glen Rock PA 17327

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper exhibits that give further information of your case, attach them to this completed form. Use as much space as you need. Attach extra sheet(s) if necessary) Please find attached the statement of claim.

3. (CONTINUED) Please find it attached
statement of claim.



4. WHEREFORE, plaintiff prays that Please find it attached
statement of claim



V. Kion Callaghan
(Signature of Plaintiff)

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA**

(CIVIL DISVISION)

FILED
HARRISBURG, PA

JAN 24 2024

DEPUTY CLERK

VIVIAN MARITZA CALLAGHAN

NO.

PLAINTIFF ^{PER}

vs.

FRED A. GOOD and

DEFENDANTS

JULIE E. GOOD

**COMPLAINT PERJURY FOR WRONGFUL
EJECTMENT AS A TENANT**

COMPLAINT PERJURY FOR WRONGFUL EJECTMENT AS A TENANT

AND NOW, this 24th day of January, come the plaintiff, Vivian Callaghan, who files this complaint and hereby avers as follows:

1. The Plaintiff, Vivian Callaghan is an adult individual presently residing at 6071 Pine Road, Thomasville, York County, Pennsylvania 17364.
2. The Defendants, Fred Good and Julie Good are adult's individuals presently residing at 4092 Manchester Street, Glen Rock, Pennsylvania, 17364.
3. The perjury for wrongful ejectment as a tenant arose took place in York County, Pennsylvania.
4. On June 8, 2022, the Plaintiff has the courage to escape her confinement and seek help, she asked help to an Uber driver to take her to the Court of Commons Pleas of York County; the plaintiff went there to request help for human trafficking but the only assistance she got was for domestic violence; for reasons beyond my knowledge I was not able to get help calling 911, as soon as they transfer my call to my zip code 17364 there was not help. The Plaintiff called two times to the human trafficking hotline; on the first call after they transfer my call to my area code 17364 and give information and hangup an state trooper called me and told me that there is a lot of help for victims like me; I got scare and say thank you; minutes after an state trooper just start pounding on my front door; I saw him through the window and he looked very angry so I got scare and I hided in the bathroom waiting for the state trooper to leave the property; I am giving this information for the Honorable Court understand where I coming from and why I am residing at the property and why I am not a tenant with a lease or verbal lease, or squatter, or trespasser. Because this is the base of the case why the Defendants start committing perjury for the only one goal to remove me

from the property after I have escaped and inform the court about my situation, but no one hear me.

5. The first perjury for wrongful ejectment as a tenant it was on the Notice to Quit, on this initial Complaint on July 11, 2022 the defendants stated that I was a tenant with a lease, and I was paying \$500 monthly rent; they also stated that "If no funds are received by July 25, 2022, we will proceed with a suit for the back rent, in addition to eviction and possession. Enclosed is a Notice to Quit for service on you." Please find attached Exhibit "A" the Notice to Quit; a letter from the defendants' attorney and the Landlord/Tenant Complaint Form, here you can see Beyond reasonable doubt that they committed Perjury. Both defendants and defendants' attorney violated Section 4904 of the Crimes Code (18 PA C.S. § 4904). Please find attached Exhibit "B" Landlord/Tenant Complaint Form.
6. Then on August 12, 2022 I received the Recovery of Real Property Hearing Notice. Please find attached Exhibit "C." On the hearing day I was going to sue the Defendants for Wrongful Eviction in York PA by the Defendant Fred Good and submit the Civil Complaint for Wrongful Eviction and asks judgment against the defendant for \$12,000 for the statute/ordinance violated. Please find attached Exhibit "D" the Civil Complaint. In this case Fred Good is the Defendant but for the wrongful eviction he was the plaintiff; his attorney saw that I was going to file the Civil Complaint for Wrongful Eviction against the plaintiff Fred Good and I was going to request a judgment for \$12,000. Then the plaintiff's attorney told the plaintiff to withdraw the complaint for eviction; then the plaintiff Fred Good told to the Judge that he was not going to evict me and since now I have my own bedroom everything is ok; so the defendant Vivian Callaghan can live at the property; there is a recording where plaintiff, Fred Good promise me not to evict me again and the plaintiff swears to me not to evict me again, but he lies.
7. Beyond reasonable doubt the Defendant, Fred Good and his attorney Peter Vaughn, Gettle Vaughn Law LLC violated the eviction law by submitting a Landlord/Tenant Complaint. The plaintiff, Vivian Callaghan holds legal grounds to sue the Defendant, Fred Good for costs and damages, (pain and suffering) in a court of law due to wrongful eviction and Retaliatory Eviction because I have escaped from confinement and I am a victim of human trafficking, sexual abuse, labor abuse, mental abuse, and physical abuse, because the plaintiff, Vivian Callaghan requested a PFA (Protection From Abuse) order and the Judge granted the PFA and evicted the defendant, Fred Good from the premises on June 8, 2022; he got so angry that his victim escaped, now everybody knows about her so the defendant want to use all the illegal means to evict her.
8. The State and Federal law require the plaintiff to prove the same three elements to establish a prima facie case of retaliation: (1) the plaintiff engaged in statutorily-protected activity to request a PFA order and it was granted and the defendant is doing unlawful eviction, this is a wrongful eviction to evict the plaintiff from her residence; (3) there is causal relationship between the two. The key elements of a retaliation claim are protected activity, "materially adverse action," and a causal connection between the two.

9. If the plaintiff never go to request a PFA order; and the defendant would not have been evicted from the property; then the defendant would have continue abusing the plaintiff physically, sexually, mentally and for labor abuse too then this wrongful eviction will not take place; if the plaintiff keep quiet no one will know that the plaintiff is a victim of human trafficking and the defendant will be happy and he will not being suing me.
10. Then comes the second eviction, but this time the defendants are claiming that the plaintiff is a squatter and need to be ejected from the property. On the initial Complaint the defendants say under point "10. There is no landlord-tenant relationship between the parties." Now there is not landlord-tenant relationship like in the previous lawsuit. Pleas find attached Exhibit "D" the initial Complaint. Beyond reasonable doubt the Defendant, Fred Good and his attorney Peter Vaughn, Gettle Vaughn Law LLC committed perjury crime under the perjury offenses under 18 U.S.C. §§ 1621 and 1623.
11. Another perjury offenses are demonstrated under the initial Complaint point "11. Since June of 2022, the plaintiff, Fred Good, has asked the defendant to vacate the property, along with her personal belongings and pets. An attempt to evict her through the magistrate also failed." The defendant Fred Good has not asked me to vacate the property instead the defendant and his attorney were using perjury to be able to make their case for ejectment. The first attempt to evict the plaintiff it was through perjury under oath with the Honorable Judge Thomas J. Reily at the Magisterial District Court 19-3-06 Spring Grove. Please see Exhibit "C" Recovery of Real Property Hearing Notice.
12. Another perjury offenses are demonstrated under the initial Complaint point "12. The defendant refuses to vacate the property and continues to remain there with over 20 animals in the home." I am a victim of human trafficking, he coerce me to move from the State of Virginia to the State of Pennsylvania to live with the defendant, I never imaging that I was going to be a victim of human trafficking, sexual abuse, labor abuse and physical/mental abuse; I thought that by working on the US auto accident I was going to have money to go to Ireland to work on my major injury case that left me disabled; upon my return I was going to pay the defendant and move out; that was the plan but it was my plan; I never imaging that the defendant has other plans for me, as soon as I entered his property (I was scare because is dirty to maximum, with infestation of mice in the walls; black and green mold; there are an infestation of pest to the point that even my cats were afraid to walk around. I have to clean the place the best I could since I am disable and I cannot use my hands and legs to fix the property; the only way I have to fix the broken windows, or many other places is using duck tape) the defendant received me very angry after Aprile 13, 2021 he became an abuser and the sexual abuse, physical abuse, labor abuse, and mental abuse started every day; it was like 24/7 days of torture. As a victim of human trafficking, I am doing the best I can do to live one day at the time and hopping that the Pennsylvania Office of Attorney General, Criminal Department has my case; but it is taking time; meanwhile the traffickers are using all perjury they can to eject me from the property.

COUNT I - PERJURY FOR WRONGFUL EJECTMENT AS A TENANT

13. Paragraphs 1-12 are herein incorporated by reference.

14. Another perjury offenses are demonstrated under the initial Complaint point "17. ... The plaintiff, Julie E. Good, stands to lose value in the property by virtue of the defendant's ongoing use of the property without permission or right..." Now they are claiming that I am squatter and just broke into the property without permission and this is not true, the defendant used coercion to bring me from the state of Virginia to the state of Pennsylvania throughout coercion and false pretenses. The defendant deceive me by making me believe that by he helping me with housing I was going to be able to concentrate in my cases so I will get the money and then move out from the property but this is only my idea how everything will work out; the defendant has another idea to use me for sexual abuse, he asked many times to sale myself in the internet to get money; and he introduce me men in public places without knowing that I was going to meet someone; he was wanting to sale me; he used to say that I have to pay him the loan; all the money he has given me; and he forgot that I was going to get the money by getting my two cases. The defendant used to call me names and make fun of my English and used to tell me that the lawyers taking my auto accidents case are only fulling me; he also told me that from here you are going to go down, down, down.

15. Another perjury offenses are that now the defendant is claiming that I am a tenant with a verbal agreement; and this is not true. The defendant's attorney states that "At best, the so-called Contract is an oral agreement allowing Ms. Callaghan to a lease-type occupancy of the Property for an unspecified term, that is until she settled her case in Ireland, which is indefinite and uncertain. "All leases for uncertain terms are *prima facie* leases at will." This is not true because after the defendant abuse me everyday and all his verbal abuse, physical abuse, sexual abuse, and labor abuse I did not have the time to work on my US case or the Ireland one. I spent 9 months under torture that I was not able to do anything thanks to God he was not able to break me; for that reasons on June 8, 2022 I was able to escape but this only took me to all these legal retaliation and aggression using all the lies and perjury that they can to be able to accomplish their goal to eject me, no matter what law they will use or case law they will use to make their point for perjury; between the defendants' attorney and the defendants lies were able to evict me as a tenant using leases for uncertain term are *prima facie* leases at will.

16. Now I am a trespasser by remaining on the property without any right to do so after her license or invitation was rescinded by issuance of the notice to quit. I never got that notice to quit only I got the notice from the Sheriff to inform me that this coming

Friday, January 26, 2024 at 2 pm they are coming to remove me from the property by force. They have use perjury to make their claim credible to be able to execute the eviction. Please find attached the Exhibit "E" the Notice of Possession.

Due to the above reasons the writ of possession needs to be stopped. It is illegal writ of possession.

WHEREFORE, the plaintiff demand to the defendants to pay \$750,000 or more due to the harm I have suffered as a result of the perjury, such as loss of reputation, emotional distress, financial losses and punitive damages; after all the above mentioned I have demonstrated that the defendants and the defendants' attorney have acted with malice disregard for the truth using perjury with the only goal to eject the plaintiff at the issuance by this Honorable Court of an order for the defendant for **PERJURY FOR WRONGFUL EJECTMENT AS A TENANT**.

At the same time, I humbly request to the Honorable United States District Court for the Middle District of Pennsylvania to stay the writ of possession for this coming Friday, January 26, 2024. If this unlawful eviction takes place will harm the plaintiff and her life will be in danger.

This the 24th day of January 2024.

Respectfully submitted,



Vivian Callaghan
Plaintiff

6071 Pine Rd

Thomasville, PA 17364

viviancallaghan@gmail.com

Tel: (223) 284.6748

VERIFICATION

I, Vivian Callaghan, verify that the statements made in this the **PERJURY FOR WRONGFUL EJECTMENT AS A TENANT** are true and correct, upon my personal knowledge and information and belief. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

This the 24th day of January 2024.


Vivian Callaghan
Plaintiff